



**Office of the  
Special Narcotics Prosecutor  
for the City of New York**

Bridget G. Brennan, Special Narcotics Prosecutor

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January 11, 2020

VIA ONEDRIVE



Re: People v. [REDACTED], Ind. No. [REDACTED]

Dear Counsel,

As you know, I am the Assistant District Attorney assigned to the case of the People v. [REDACTED]. [REDACTED] This disclosure concerns Undercover Detective C0043 ("UC 43"), whom the People intend to call as a witness in this case.

On October 20, 2017, an assistant district attorney and an NYPD detective (not UC 43) appeared in a criminal court arraignment part at 100 Centre Street to obtain a search warrant. The warrant was based on information provided by UC 43 to the detective who appeared in the arraignment part with the assistant district attorney. The assistant district attorney dropped the warrant off in the well of the courtroom and returned to the audience. The detective was sitting in the front row, and UC 43 was sitting in the back row. UC 43 was involved in the narcotics investigation related to the search warrant, but UC 43's presence was not required to swear out the warrant. The courtroom was very crowded.

UC 43 tried to stop and talk with the assistant district attorney as he made his way into the audience. The assistant district attorney ignored him and sat in the front of the audience with the detective. The detective and the assistant district attorney were speaking with a defense attorney when UC 43 sat down directly behind them. UC 43 leaned up against the detective and the assistant district attorney, put his head between them, and began talking. The assistant district attorney told UC 43, in substance, that UC 43's presence and actions in the courtroom might impact the likelihood of closing a courtroom pursuant to a future Hinton hearing. UC 43 responded by stating, in substance, "How would anyone know to ask me about this during a Hinton hearing?" The assistant informed the detective that his actions would have to be disclosed.

UC 43 left the courtroom, but returned a short time later and again sat behind the detective and the assistant district attorney, leaning towards them and having incidental physical contact. In addition, UC 43 was admonished by court officers for not removing his hat.

After the search warrant was obtained, UC 43 stood with the detective in the hallway of the courthouse, and then insisted on shaking the hand of the assistant district attorney.

The People reserve the right to move in limine to preclude or limit reference to this information in any further proceedings in this prosecution.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Brodowski', is written over the typed name.

Jakub D. Brodowski  
Assistant District Attorney  
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